

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

AUTHORS GUILD, DAVID BALDACCI, MARY BLY, MICHAEL CONNELLY, SYLVIA DAY, JONATHAN FRANZEN, JOHN GRISHAM, ELIN HILDERBRAND, CHRISTINA BAKER KLINE, MAYA SHANBHAG LANG, VICTOR LAVALLE, GEORGE R.R. MARTIN, JODI PICOUT, DOUGLAS PRESTON, ROXANA ROBINSON, GEORGE SAUNDERS, SCOTT TUROW, and RACHEL VAIL, individually and on behalf of others similarly situated,

Plaintiffs,

v.

OPENAI INC., OPENAI LP, OPENAI LLC, OPENAI GP LLC, OPENAI OPCO LLC, OPENAI GLOBAL LLC, OAI CORPORATION LLC, OPENAI HOLDINGS LLC, OPENAI STARTUP FUND I LP, OPENAI STARTUP FUND GP I LLC, and OPENAI STARTUP FUND MANAGEMENT LLC,

Defendants.

JONATHAN ALTER, KAI BIRD, TAYLOR BRANCH, RICH COHEN, EUGENE LINDEN, DANIEL OKRENT, JULIAN SANCTON, HAMPTON SIDES, STACY SCHIFF, JAMES SHAPIRO, JIA TOLENTINO, and SIMON WINCHESTER, on behalf of themselves and all others similarly situated,

Plaintiffs,

v.

OPENAI INC., OPENAI OPCO LLC, OPENAI GP, LLC, OPENAI, LLC, OPENAI GLOBAL LLC, OAI CORPORATION, LLC, OPENAI HOLDINGS, LLC, OPENAI STARTUP FUND I LP, OPENAI STARTUP FUND GP I LLC, and MICROSOFT CORPORATION,

Defendants.

ECF CASE

No. 23-cv-08292-SHS
No. 23-cv-10211-SHS
No. 24-cv-00084-SHS

**RULE 7.1 CORPORATE
DISCLOSURE
STATEMENT**

NICHOLAS A. BASBANES and NICHOLAS NGAGOYEANES (professionally known as Nicholas Gage), individually and on behalf of all others similarly situated,

Plaintiffs,

v.

MICROSOFT CORPORATION, OPENAI, INC., OPENAI GP, LLC, OPENAI HOLDINGS, LLC, OAI CORPORATION, LLC, OPENAI GLOBAL, LLC, OPENAI, LLC, and OPENAI OPCO LLC,

Defendants.

Defendants OpenAI, Inc., OpenAI OpCo, L.L.C., OpenAI GP, L.L.C., OpenAI, L.L.C., , OpenAI Global, L.L.C., OAI Corporation, L.L.C., OpenAI Holdings, L.L.C., OpenAI Startup Fund I, L.P., OpenAI Startup Fund GP I, L.L.C., and OpenAI Startup Fund Management, L.L.C. (together, “OpenAI”), by and through their undersigned counsel, pursuant to Federal Rule of Civil Procedure 7.1, disclose as follows:

1. OpenAI, Inc. states that it has no parent corporation and that no publicly held corporation has a financial interest of 10% or more.
2. OpenAI GP, L.L.C. states that it is a subsidiary of OpenAI, Inc. and that no publicly held corporation has a financial interest of 10% or more.
3. OpenAI, L.L.C. states that it is a subsidiary of OpenAI Global, L.L.C. and that Microsoft Corporation is a publicly held corporation that has a financial interest of 10% or more in OpenAI Global, L.L.C.

4. OpenAI OpCo, L.L.C. states that it is a subsidiary of OpenAI Global, L.L.C. and that Microsoft Corporation is a publicly held corporation that has a financial interest of 10% or more in OpenAI Global, L.L.C.

5. OpenAI Global, L.L.C. states that it is a subsidiary of OpenAI, Inc. and that Microsoft Corporation is a publicly held corporation that has a financial interest of 10% or more in OpenAI Global, L.L.C.

6. OAI Corporation, L.L.C. states that it is a subsidiary of OpenAI, Inc. and that no publicly held corporation has a financial interest of 10% or more.

7. OpenAI Holdings, L.L.C. states that it is a subsidiary of OpenAI, Inc. and that no publicly held corporation has a financial interest of 10% or more.

8. OpenAI Startup Fund I, L.P. states that it is a subsidiary of OpenAI Startup Fund GP I, L.L.C. and that Microsoft Corporation is a publicly held corporation that has a financial interest of 10% or more in OpenAI Startup Fund I, L.P.

9. OpenAI Startup Fund GP I, L.L.C. states that it has no parent corporation and that no publicly held corporation has a financial interest of 10% or more.

10. OpenAI Startup Fund Management, L.L.C. states that it has no parent corporation and that no publicly held corporation has a financial interest of 10% or more.

Dated: February 16, 2024
New York, New York

Respectfully submitted,

LATHAM & WATKINS LLP

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